

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff
v.
ALAN GOMEZ-MARENTES,
Defendant.

NO. CR20-092 JCC

UNITED STATES' MOTION TO FILE A
BRIEF IN EXCESS OF TWELVE
PAGES

NOTED: November 12, 2021

The United States of America, by Nicholas W. Brown, United States Attorney for the Western District of Washington and Amy Jaquette, Assistant United States Attorney for said District, hereby seeks an order from this Court permitting the United States to file a Response to Defendant's Motion for Temporary Release in excess of the twelve-page limitation prescribed in CrR 12(c)(6) of the Local Rules of the United States District Court for the Western District of Washington. Specifically, the United States seeks the Court's approval to file a Response that is up to 14 pages in length.

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The United States seeks this authorization to file an over-length brief because it seeks to thoroughly address the issues and arguments raised in the defendant's motion, notably, the manner in which the Bureau of Prisons is handling the defendant's medical condition. It is also necessary to inform the Court as to the legal standard the defendant must meet for temporary release – a standard which the defendant has failed to satisfy.

For these reasons, the United States respectfully requests this Court to grant this motion to file an over-length brief.

DATED this 12th day of November, 2021.

Respectfully submitted,

NICHOLAS W. BROWN
United States Attorney

/s/ Amy Jaquette
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